

# Appendix I – Environmental Justice

## Introduction

This appendix summarizes the 2050 SJATSO MTP environmental justice analysis. As the recipient of federal transportation funds, SJATSO ensures non-discrimination in all aspects of the transportation planning process. The following documents the 2050 MTP fiscally constrained projects in relationship to the defined Environmental Justice (EJ) areas, as well as analyzing transit service from an EJ perspective.

## Environmental Justice

The Environmental Protection Agency (EPA) defines EJ as the “fair treatment for people of all races, cultures, and incomes, regarding the development of environmental laws, regulations, and policies.” EJ is a federal requirement that projects using federal funds ensure the following:

To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.

To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Furthermore, it is important that all people regardless of race or income have access to the benefits afforded by federally funded projects as well as access to the decision-making process for the selection of those projects.

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance” (42 U.S.C. 2000d-1). Additionally, in 1994, President Clinton issued Executive Order 12898 which states that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

## Baseline Demographics

SJATSO monitors demographic data within the Metropolitan Planning Area (MPA) to assist with transportation planning activities and future transportation/mobility investment decisions. Demographic data for the St. Joseph region is summarized in Appendix C. This appendix focuses on analyzing the primary EJ demographics, minority populations and low-income households (below poverty), as they relate to the fiscally constrained 2050 MTP projects.

When considering demographic data in planning and policies, there are a variety of ways to combine and analyze the information. For the purposes of Title VI and EJ analysis, SJATSO not only uses data on protected classes but also pays attention to what would be considered potential indicators of disadvantage—such as zero car households and persons with disabilities. While not federally required, this additional information helps provide a more complete representation of the community and potential transportation/mobility needs. Figures 1 to 6 display the demographic data that supports the EJ analysis. In analyzing the 2050 MTP fiscally constrained projects, minority population and low-income households represent the datasets used to identify EJ areas. Figure 1 displays minority population and Figure 2 displays low-income households. These combined areas are displayed in Figure 7.

### Limited English Proficiency (LEP)

Persons for whom English is not their primary language and have a limited ability to read, write, speak, or understand English are designated the status Limited English Proficiency (LEP) within the construct of Title VI and implementing regulations. SJATSO has analyzed LEP populations as part of the SJATSO Title VI Plan (approved by the Coordinating Committee on November 21, 2021) and have determined that the relatively small size of the LEP population, along with budget constraints, make the translation of documents cost prohibitive. However, as documented in the LEP Implementation Plan, SJATSO is committed to including all residents in the transportation planning and decision-making process. To that end, SJATSO reviews the LEP approach on a regular basis to assess any significant changes in need and to ensure that language barriers are not preventing LEP persons from participating meaningfully in the transportation planning and decision-making process.

The SJATSO Title VI Program (current at the time of the 2050 MTP adoption in December 2024) can be found at:

<https://www.stjosephmo.gov/DocumentCenter/View/15471/SJATSO-2022-2025-Title-VI>

A discussion of the LEP Implementation Plan can be found beginning on page 90 of this document.

Figure 1. Minority Population

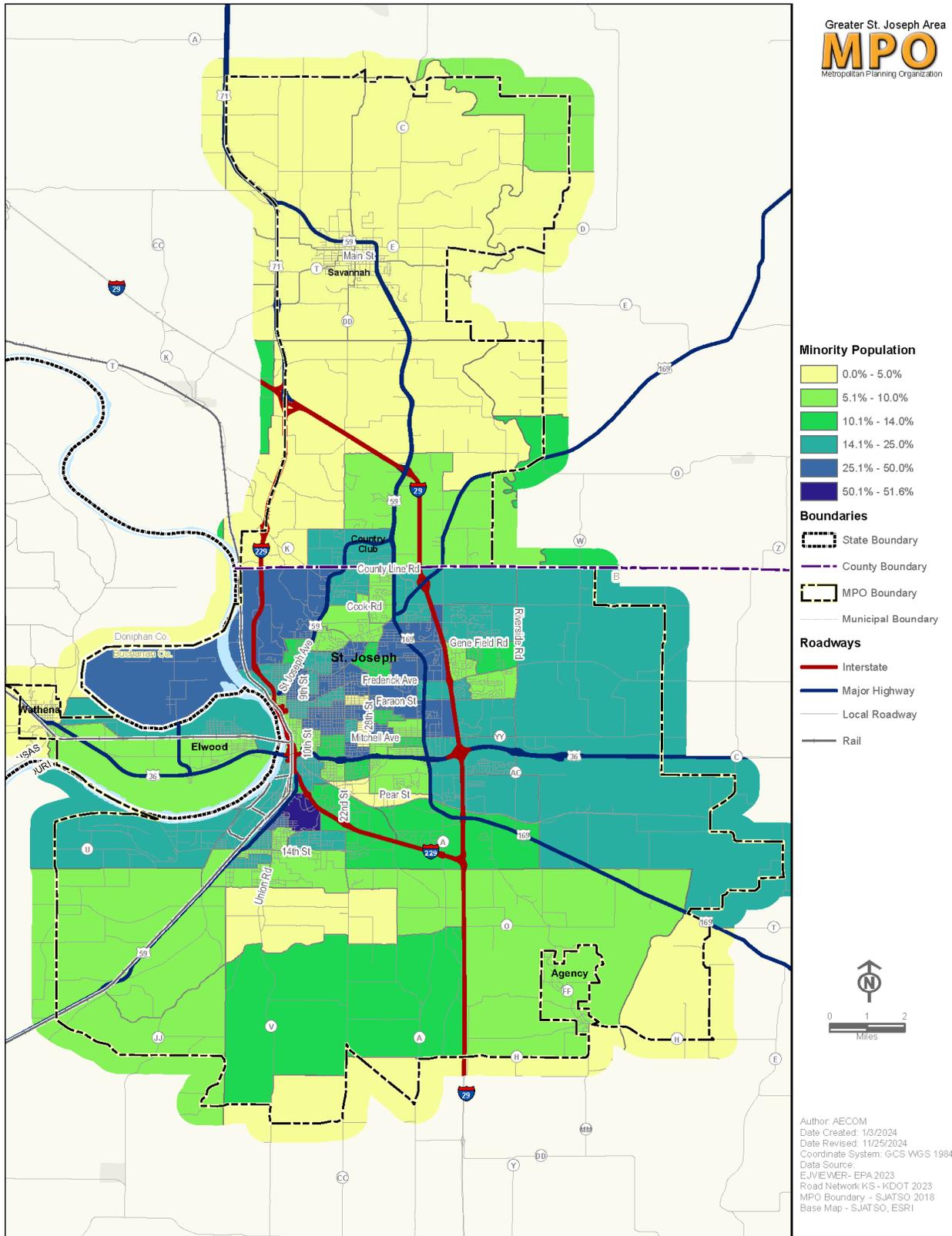


Figure 2. Household Income Below Poverty

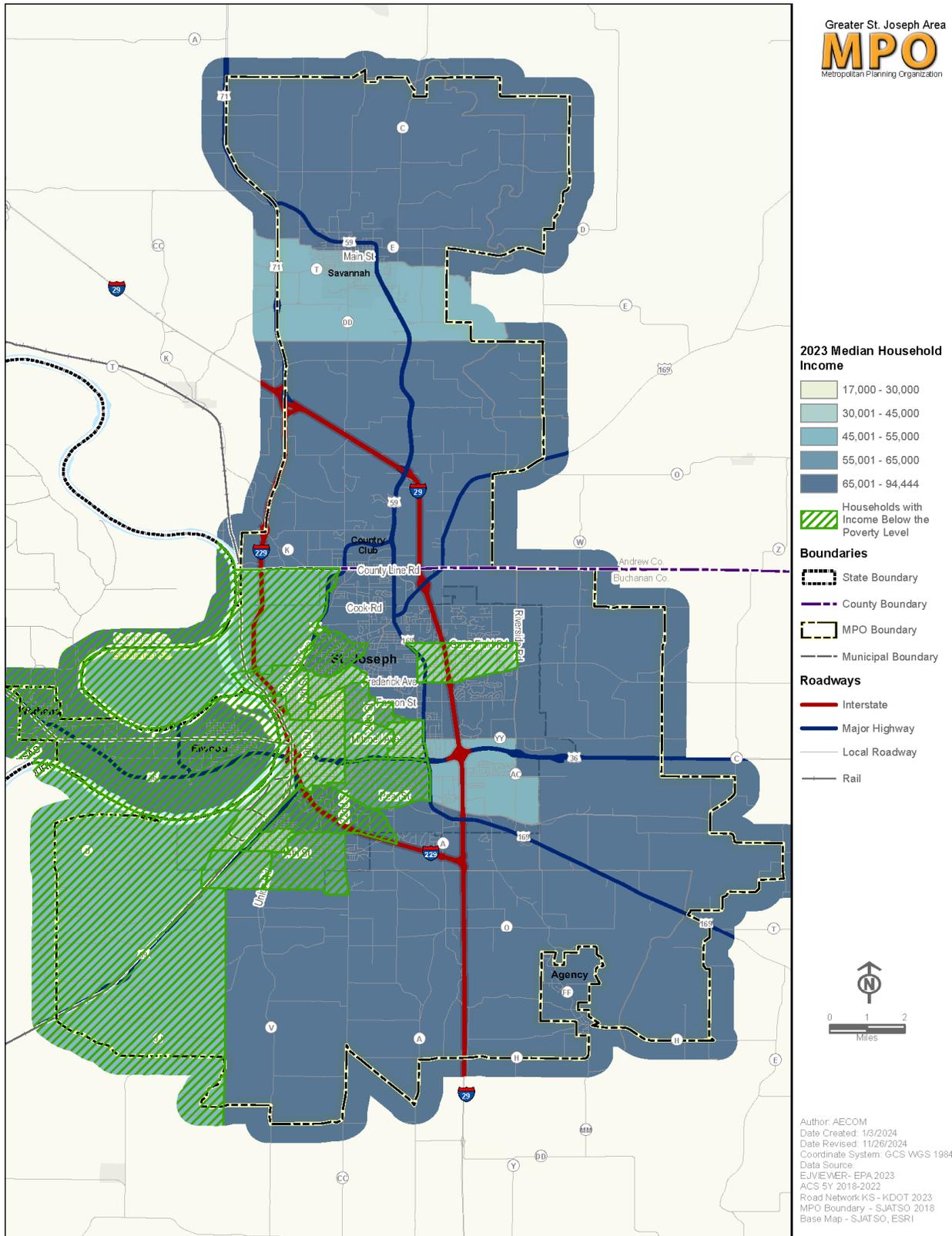


Figure 3. Median Household Income

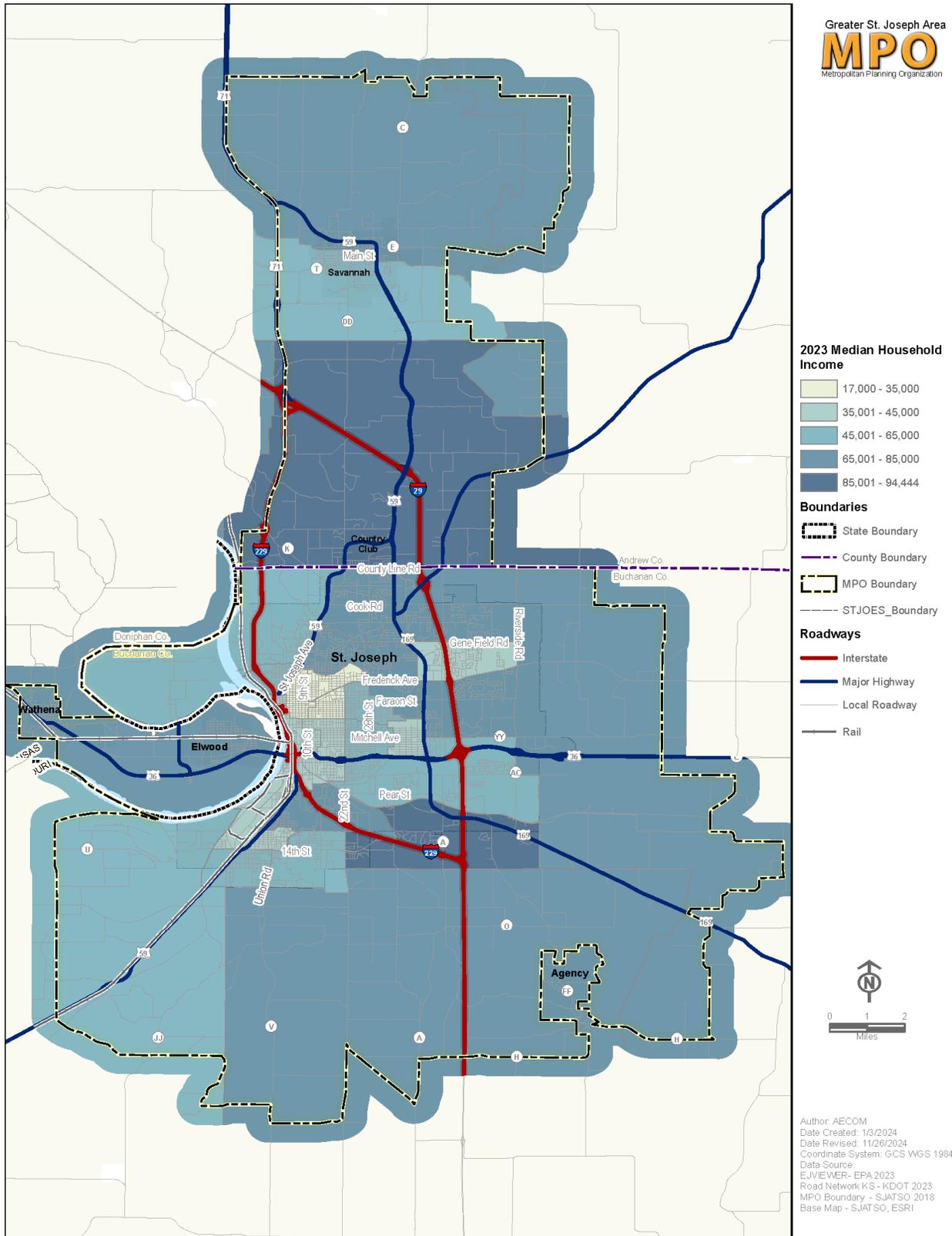


Figure 4. Population with Income Below Poverty

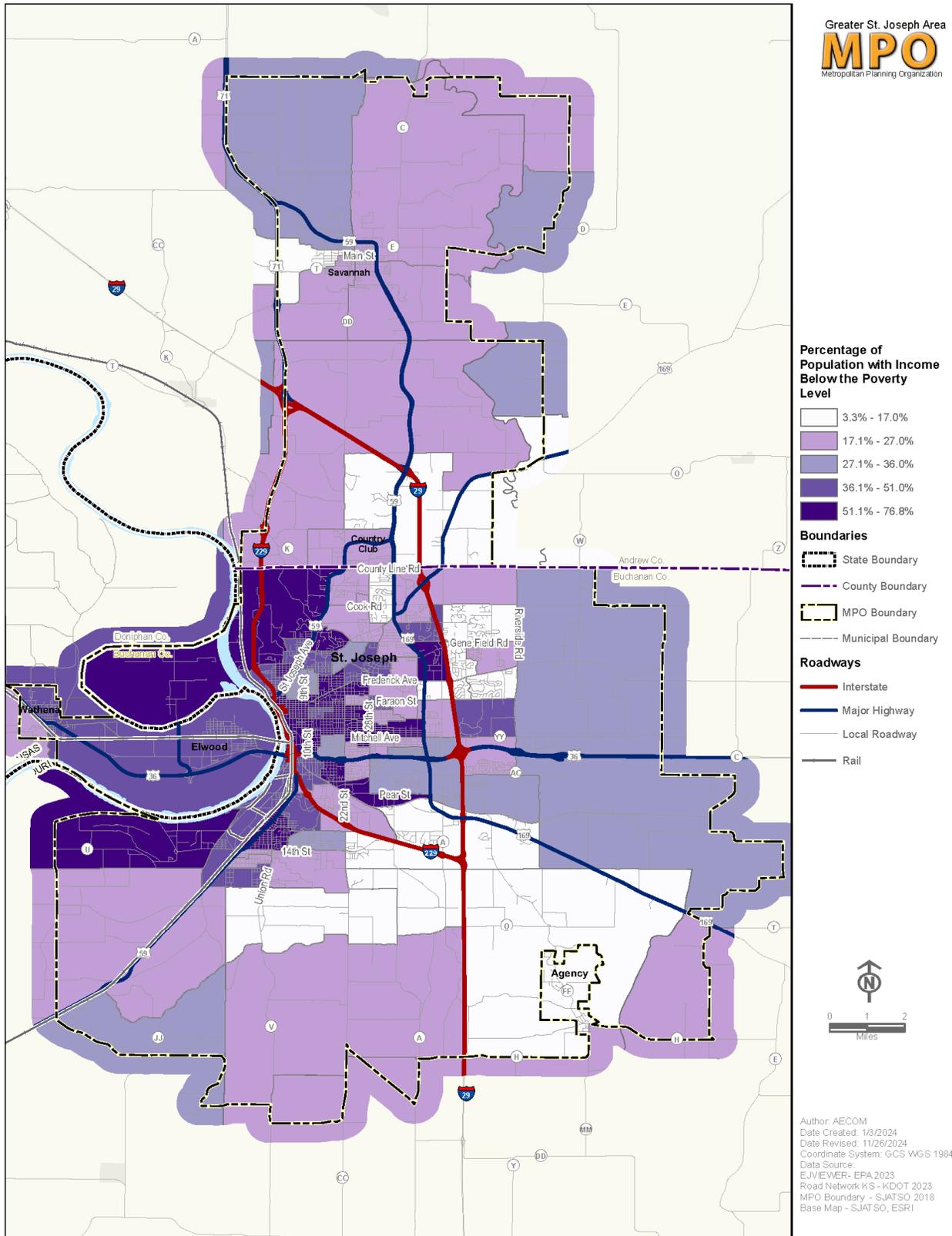


Figure 5. Households with at Least One Person with a Disability

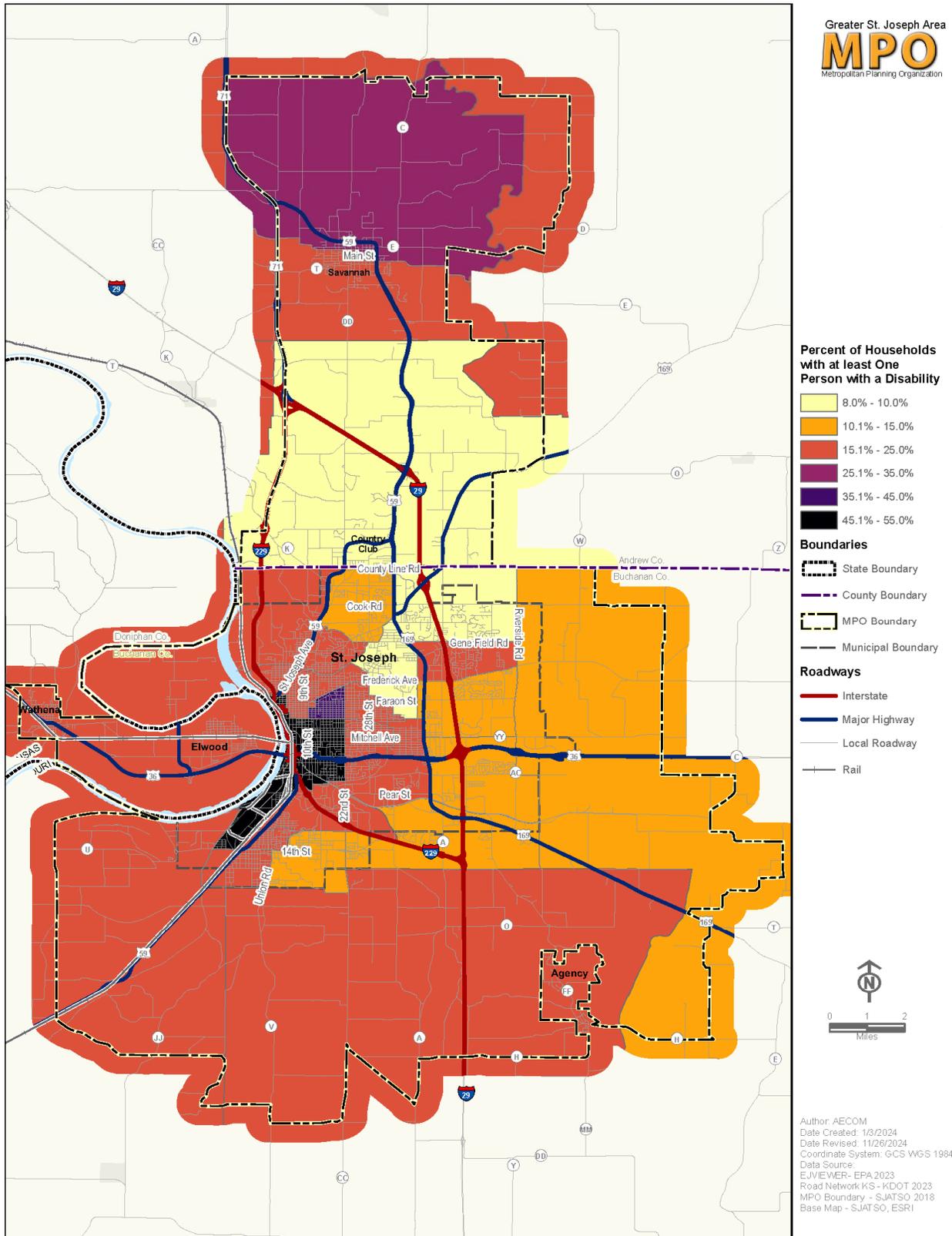
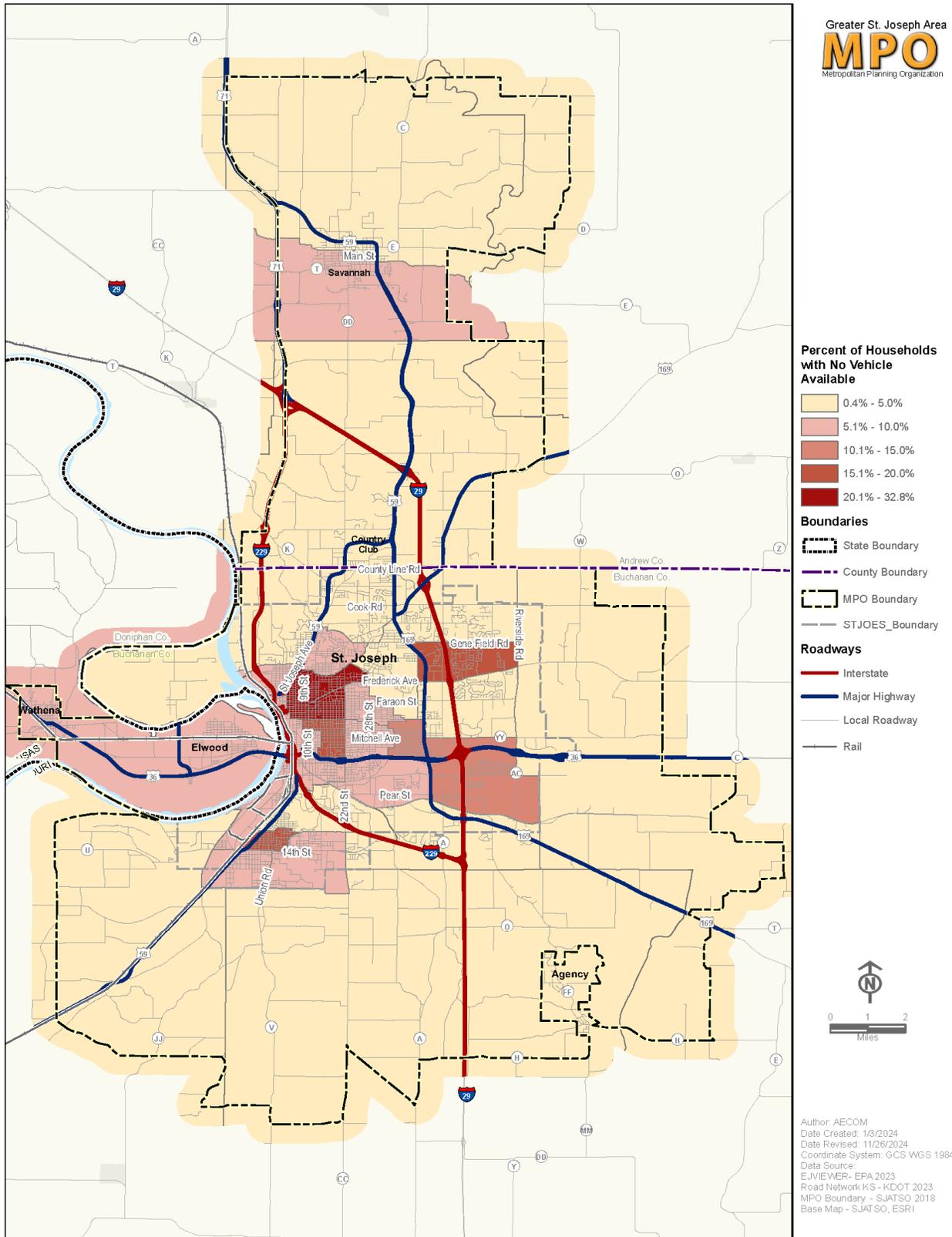


Figure 6. Zero Car Households



## Fiscally Constrained MTP Projects (in EJ Areas)

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An analysis of the 2050 MTP fiscally constrained projects was conducted to identify potentially adverse impacts on minority and low-income populations (EJ areas) within the SJATSO MPA. Figure 7 displays areas within the SJATSO MPA that meet the EJ thresholds, and Figure 8 displays the EJ areas with the fiscally constrained 2050 MTP projects. Both figures provide an alternative way of displaying the location of minority population, as one dot represents five people of color. This alternative graphic is shown to more accurately reflect the distribution of minority populations throughout the SJATSO MPA. It should be noted that the dots do not represent an exact location of the minority population. Figure 9 displays the existing transit service coverage in relationship to the EJ areas.

### Minority Population Thresholds

Minority population is defined as any identifiable group of minority persons who live in geographic proximity. Additionally, minority populations can include geographically dispersed or transient persons who would be similarly affected by a proposed transportation improvement. Minority persons include those who are American Indian, Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and other Pacific Islander.

For the 2050 MTP EJ analysis, a census tract with a minority population greater than the St. Joseph MPA average minority population (14%) is defined as an EJ area. For the most part, these areas are located within the urbanized area of St. Joseph. Some Census tracts on the east side of the MPA are larger areas which might somewhat overstate the actual physical boundaries of the minority population areas.

### Low-Income Households Threshold

Low-income population was identified using the percentage of households with income levels below the poverty line. Census tracts having greater than 20% of households below the poverty line were identified as an EJ area. The low-income population within the MPA is concentrated in the western portion of the St. Joseph urbanized area, and areas extending south along US-59 and portions of the Kansas portion of the MPA. Low-income populations also extend along the southern portion of US-36, and in small pockets along the Belt Highway.

Figure 7. Environmental Justice Areas

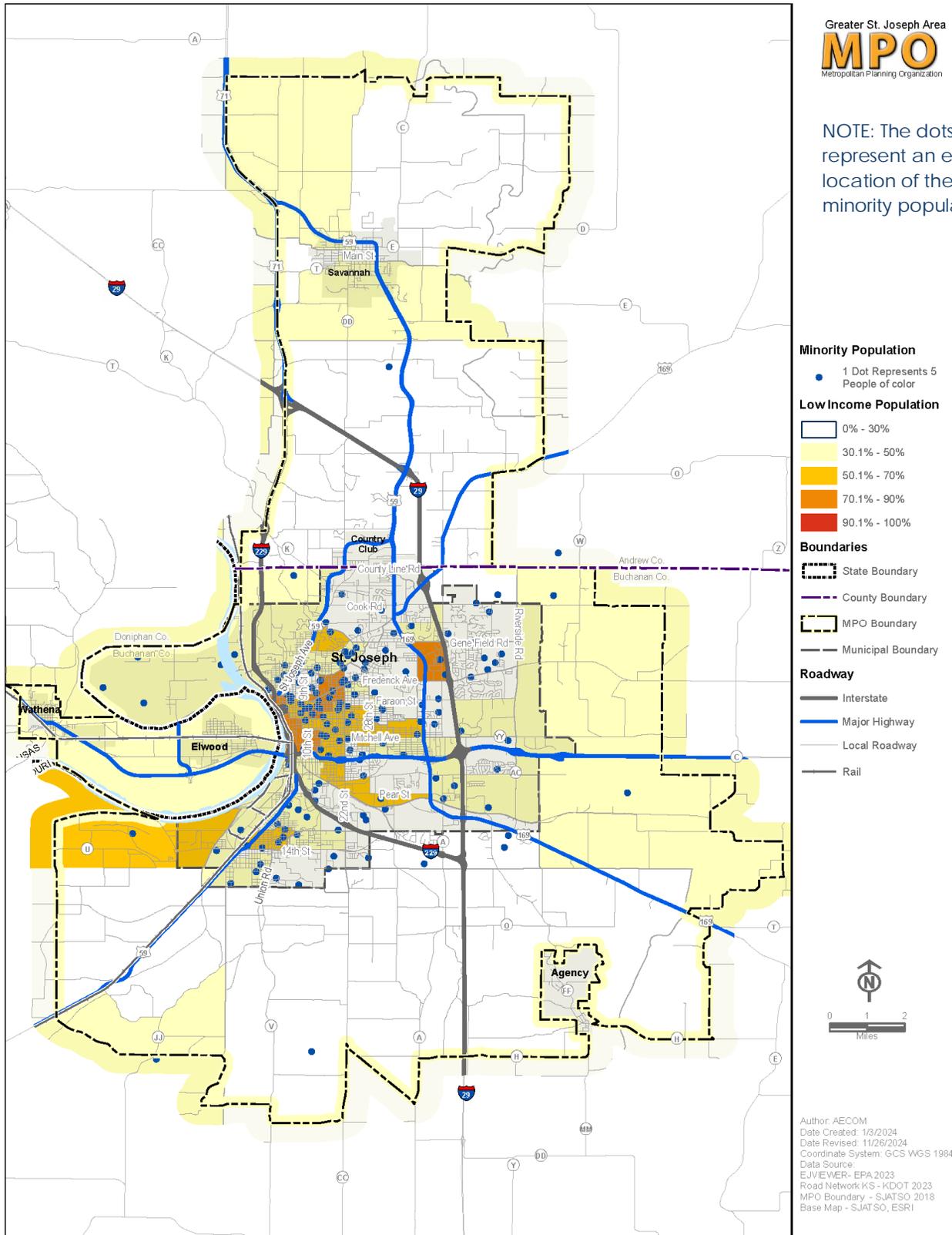


Figure 8. Fiscally Constrained Projects (within EJ Areas)

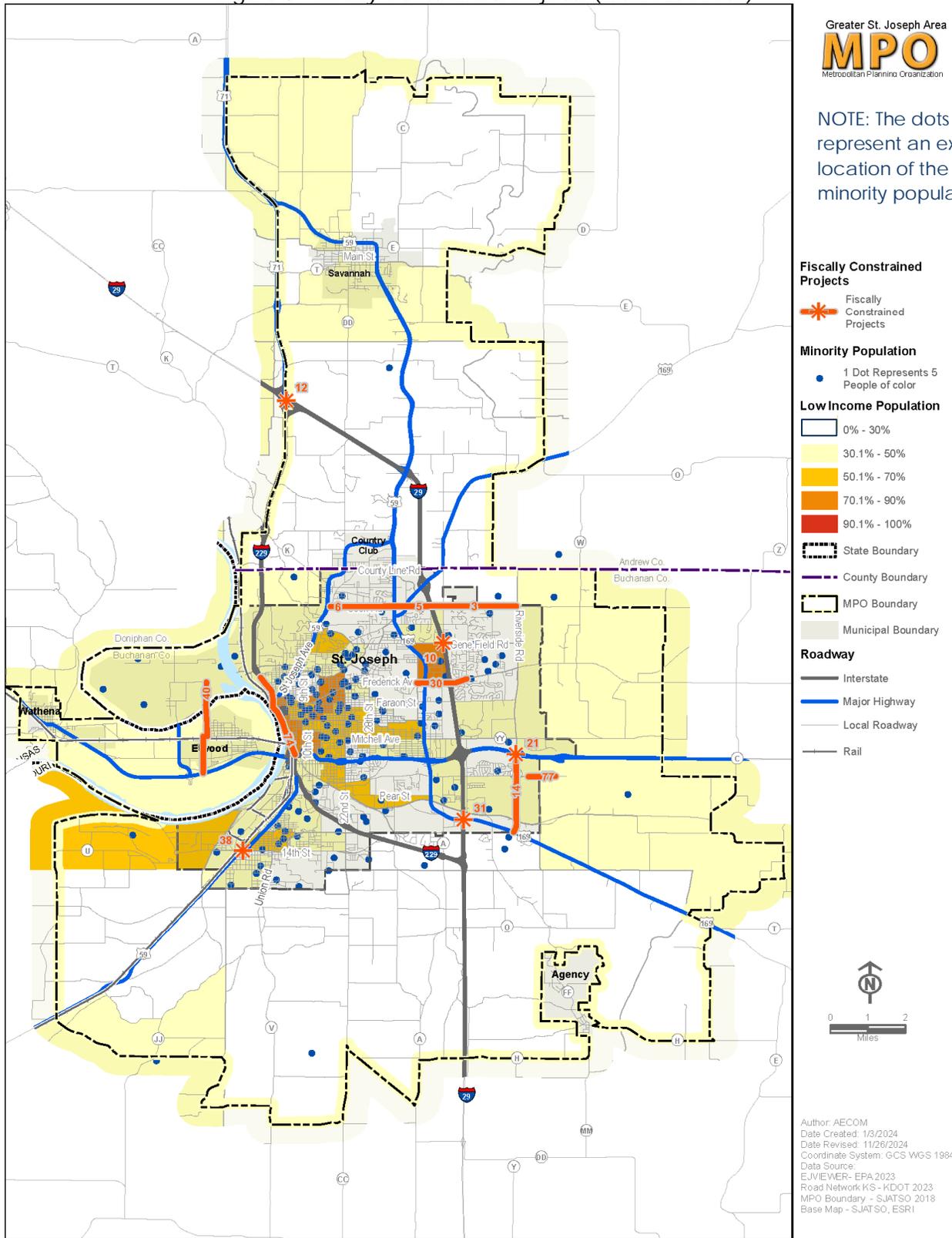
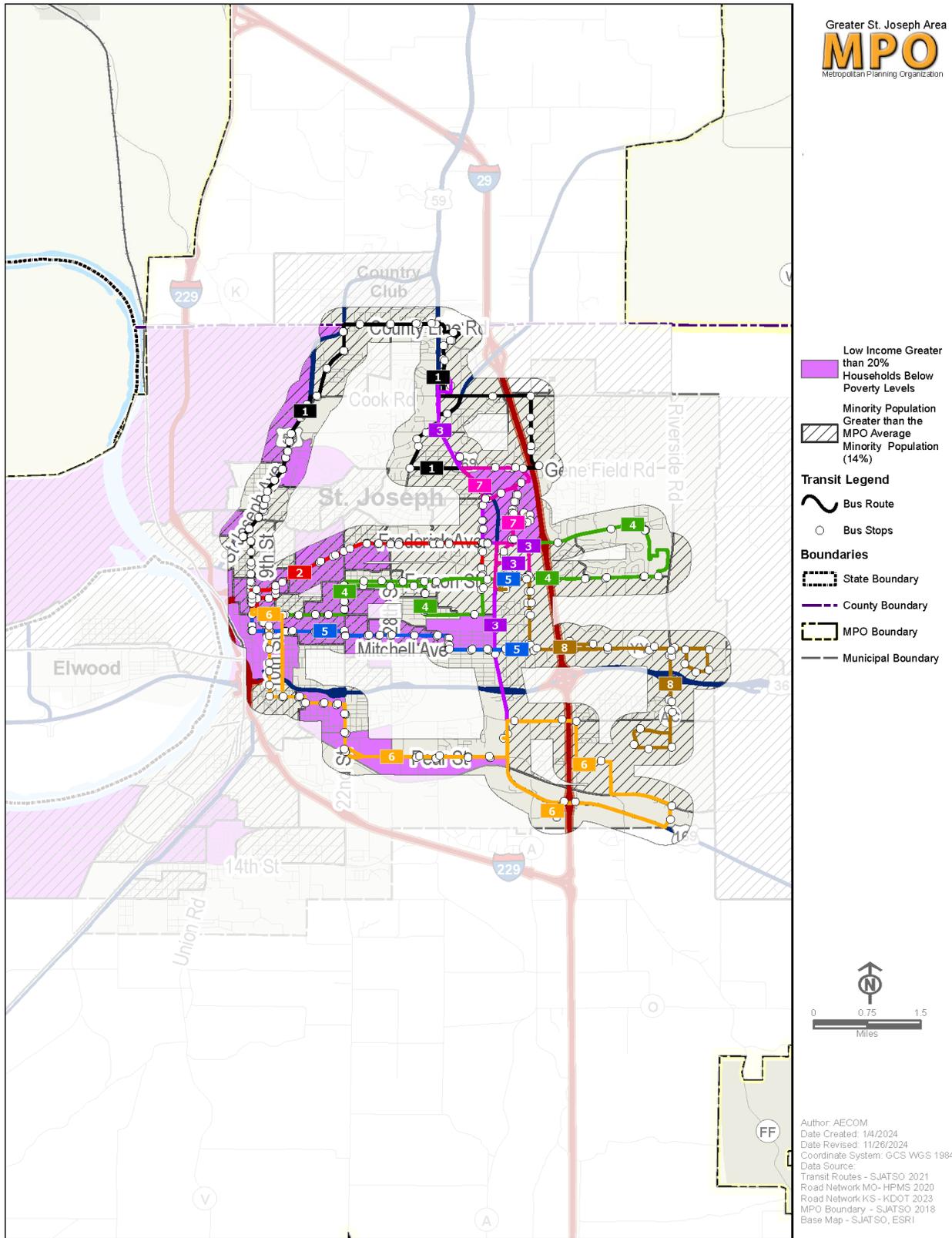


Figure 9. Existing Transit Service Route Coverage (within EJ Areas)



EJ Analysis of 2050 MTP Projects

The EJ analysis of the 2050 MTP projects highlights the potential for transportation investments to enhance EJ areas within the MPA. The following sections discusses the potential impact on roadway/freight projects, as well Go. St. Joe transit services.

Roadway/Freight

Table 1 summarizes the MTP fiscally constrained projects that fall within, partially within, or in proximity to EJ areas.

Table 1. Fiscally Constrained Projects (within EJ Areas)

ID	Project (Approximate Limits)	Minority EJ Area	Low-Income Household EJ Area
3	Cook Road (Woodbine to Riverside)		
5	Cook Road (US-169 to I-29)		
6	Cook Road (US-59 to US-169)	◆	◆
10	Gene Field Road (Bridge at I-29)	◆◆	◆◆
12	I-29/I-229/US-71 Interchange Improvement		
14	Riverside Road (Route AC) (US-36 to Pickett Rd)	◆◆	
21	Riverside Road (Route AC) (US-36 Interchange/Bridge)	◆◆	
30	Frederick Avenue (36th St. and Leonard)	◆◆	◆◆
31	I-29 (US-169) Interchange	◆	◆◆
38	Alabama Street (Near US-59)	◆◆	◆◆
40	New Airport Causeway (Location TBD)	◆	◆◆
74	I-229 (Double Decker) (I-229/US-59 to I-229/US-36/US-59 interchange)	◆◆	◆◆
77	Pickett Road (Route AC to Craig Parkway)	◆◆	

Source: AECOM; U.S. Census Data.

- ◆◆ Entire project, or majority of project, within EJ area.
- ◆◆ Portion of project within EJ area.
- ◆ Project in proximity to EJ area.

EJ populations are found in nearly every neighborhood in the central portion of the MPA, and they are employed and attend educational institutions throughout the region. Businesses, recreation facilities and community facilities serving the residents are found in all areas covered by this plan. However, in some cases, minority, low income and disabled

residents face particular challenges when it comes to transportation, tending to rely more on transit, carpooling, cycling and walking compared to a non-EJ person. EJ populations form a greater proportion of the region in the St. Joseph urban core and areas west and southwest. These also tend to be the most densely populated areas of the region, the areas with the highest rates of unemployment, and with some of the oldest infrastructure.

Approximately half of the 2050 MTP roadway/freight fiscally constrained projects are located in areas identified as having both minority and low-income populations. In analyzing these projects, it is believed that there are no adverse impacts on the EJ populations, with the exception of some potential concerns as it relates to the I-229 Double Decker bridge (discussed below). The project improvements would improve transportation infrastructure and enhance overall transportation mobility. Frederick Avenue (#30), for example, would enhance the streetscape which would specifically include bicycle and pedestrian improvements to make it safer for vulnerable roadway users.

Regarding the I-229 Double Decker bridge project (#74), the construction of the project will require the I-229 bridge to be shut down for an extended period of time. While some traffic will use I-29 as a detour, it is anticipated that a significant amount of traffic will continue to travel north-south through the area on local City streets. As such, efforts should be made to provide a safe walking and biking environment, especially as traffic levels increase in the downtown.

Projects that were not directly located within an EJ area do not mean there is no positive impact on the EJ population. Portions of Cook Road, for example, are not directly located within EJ areas; however, as documented throughout the MTP, the Cook Road improvements would enhance regional travel connections which in turn would enhance regional access, including access to area businesses. Furthermore, the improvement has potential transit benefits as a fixed-route bus service could potentially operate along the corridor in the future. The remaining projects were all determined to potentially have positive impacts on the EJ population. The one project that does not directly have direct impacts to the EJ population is the I-29/I-229/US-71 Interchange Improvement (#12); however, this project addresses a known safety concern in the region which would be beneficial to all users.

### Transit Service

Figure 9 displays existing transit service coverage in relation to the EJ areas. Of the current designated bus stops, approximately two-thirds fall within a defined EJ area. Several other bus stops are in proximity (quarter-mile buffer representing a reasonable walking distance) to EJ areas, which further expands service coverage to the defined EJ areas. The route deviation, and on-demand zones, further expands service coverage as all riders are eligible to use the curb-to-curb service upon request. It is also important to note that the current fixed-route alignment covers the highest concentration of areas of zero car households and households with at least one person with a disability within the SJATSO MPA.

Since the completion of the 2045 MTP, *Go. St. Joe* has implemented improvements that have directly benefited the EJ population. First, the transit agency introduced on-demand zones in the south/southwest portion of the MPA. This was done in an effort to better

connect residents to a concentrated employment area (Stockyards area). It should be noted that these improvements were part of a detailed Transit Development Plan that was completed in 2023.

Another improvement involved the introduction of a north-south route along the Belt Highway. This new fixed-route greatly enhances transit service coverage benefiting EJ populations by eliminating time consuming transfers between routes. In addition, the transit agency also improved headways from 1-hour to 30-minutes during the a.m. and p.m. peak hours. Improving the headway reduces the time riders need to wait to catch a bus and studies have shown the more frequent bus service can improve transit ridership, and in some cases attract new riders. Unfortunately, due to Covid, and specifically a shortage in drivers, the agency had to go back to 1-hour headways; however, it is a priority for the agency to again implement 30-minute headways in the near future.

Long-range projects, such as adding regional service to Kansas City, would also benefit the SJATSO EJ areas by providing a reliable low-cost transportation option to travel to the Kansas City area. This improvement is supported by 2050 MTP survey findings that showed area residents desire some type of bus service to the Kansas City area. In many cases, the desire to travel to the Kansas City area is for medical trips, which are frequently a challenging trip for minority and low-income individuals.

#### Transportation Equity Conclusion

Following a review of the 2050 MTP projects, in comparison to the EJ areas, the SJATSO believes there are no significant EJ concerns associated with the proposed roadway/freight and transit improvements. In fact, the analysis demonstrates that the MTP projects should have positive benefits for the EJ communities and overall support the overall 2050 MTP goals.

## MTP and TIP EJ Connection

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The 2050 MTP identifies the potential EJ impacts of projects at a very high level as the MTP often contains relatively conceptual (i.e., high level) projects. As projects advance through the planning and design phases, they become more specific, and cost estimates and implementation schedules are refined. When projects are ready for programming, they generally have advanced through planning and design resulting in more refined cost estimates and construction phasing/timing. At this point in the process the TIP documents the SJATSO's prioritization of limited transportation resources available among the various needs of the region. TIP projects are also reviewed for potential EJ impacts consistent with the MTP EJ planning process.

SJATSO also maintains an interactive map that displays the physical projects listed in the TIP, allowing policy makers, project sponsors and the public to more easily visualize the transportation projects that may affect EJ populations. Together, it is through the MTP and its implementing program (the TIP) that investments to the transportation system can be examined, and addressed, for any disparate EJ impacts.